

## Operational Status of Rim Mine (M/037/0006, SJ-84-IP)

Andrea Reither < A Reither @energyfuels.com>

Thu, May 22, 2014 at 9:36 PM

To: Paul Baker <paulbaker@utah.gov>, "McDougall, Ted" <tmcdouga@blm.gov>

Cc: "Frank Filas, P.E" <FFilas@energyfuels.com>, Jaime Massey <JMassey@energyfuels.com>, Race Fisher <RFisher@energyfuels.com>, David Turk <DTurk@energyfuels.com>, Mike Bradley <mbradley@utah.gov>

Paul and Ted.

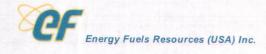
In response to an e-mail from Mike Bradley to Frank Filas dated January 30, 2014, Energy Fuels Resources (USA) Inc. (Energy Fuels) prepared the attached information. We communicated with Mike at length in recent months to better understand Utah Division of Oil, Gas & Mining (UDOGM)'s interpretation of R647-4-117, R647-3-113 and other rules pertaining to temporary suspension. The information provided here was prepared to summarize recent mining operations at our project site and provide quick access to our contact information and the Interim Management Plan in place at our mine. Also, in response to a separate communication from Mike Bradley on March 14, 2014, we proposed to spread a temporary seed mix over portions of the sites that are not in immediate use.

The enclosed Interim Management Plan was modified slightly from the previous version, a typographical error on the title page was rectified.

Please let us know if you have any questions or comments about the attached information.

Thanks.

Andrea



Andrea Reither

Environmental Permitting Specialist

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#### 2 attachments



Rim\_TempSuspension\_2014-03.pdf



Rim Interim Management Plan\_2014-05\_rev2.pdf 251K



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May 22, 2014

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Bureau of Land Management, Monticello
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365 North Main Street
Monticello, Utah 84535

## RE: Operational Status of Energy Fuels' Rim Mine (M/037/0006, SJ-84-IP)

In response to an e-mail from Mike Bradley to Frank Filas dated January 30, 2014, Energy Fuels Resources (USA) Inc. (Energy Fuels) prepared the following information. We communicated with Mike at length in recent months to better understand Utah Division of Oil, Gas & Mining (UDOGM)'s interpretation of R647-4-117, R647-3-113 and other rules pertaining to temporary suspension. The information provided here was prepared to summarize recent mining operations at our project site and provide quick access to our contact information and the Interim Management Plan in place at our mine. Also, in response to a separate communication from Mike Bradley on March 14, 2014, we proposed to spread a temporary seed mix over portions of the sites that are not in immediate use.

## 1.0 Summary of Recent Mining Operations

The mine was developed in the early 1970s by Atlas Minerals. During the 1980s, the mine operated intermittently and operated again for a few years in the early 1990's. In 2008 the mine was dewatered, rehabilitated, and put back into production. The mine stopped producing ore in the fall of 2009. Dewatering operations continued in order to allow the mine to be restarted rapidly when the price of uranium improved. During this period, underground access was necessary for regular pump maintenance which, in turn, necessitated regular ventilating of the mine. Pumped water continued to be treated and discharged in accordance with the mine's UPDES permit. In February 2013, dewatering was halted, the vents were closed and the shaft was locked. During the summer of 2013, the waste rock pile was reshaped to fill in a center trench and regraded to a 3:1 slope. The Columbus and Humbug declines were also backfilled in July 2013.



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### 2.0 Condition of Affected Land

During periods of temporary suspension of operations, the mine is regularly inspected and maintained in accordance with Interim Management Plan filed with the BLM and/or typical good housekeeping practices. In accordance with R647-4-113 and R647-4-117, UDOGM requested additional information on Energy Fuels' site management procedures. In response to that request, the Interim Management Plan for the mine is attached to this letter.

# 3.0 Proposed Temporary Seeding

In response to a request from UDOGM on March 14, 2014, Energy Fuels will seed exposed areas of the mine during this period of temporary suspension. One attempt will be made to seed in disturbed areas focusing on the top, flat areas of the waste rock piles and large, unused portions of the laydown yards. Areas around buildings will not be seeded so that the site does not appear abandoned thus making it more prone to vandalism. Seeding will be completed in the late fall or early winter and will not be preceded by topsoil spreading. Seeding methods, including seedbed preparation, will be determined by the terrain and available equipment. The purpose of this seeding effort is to encourage a temporary vegetative stand to help control weeds and reduce sediment production. This voluntary seeding effort is not expected to produce the 70% cover required for bond release due to the lack of topsoil spreading. The temporary seed mix to be used for this effort is a combination of Indian ricegrass, western wheatgrass and Needle and thread grass. These species are a subset of the seed mix that was approved for reclamation at many of Energy Fuels Colorado Plateau mines.

### 4.0 Contact Information

If you need to reach Energy Fuels during this period of limited operations, the following contact information should be used:

Race Fisher
Mine Superintendent
Office phone: (970) 677-2702
Cell phone: (970) 739-5742
RFisher@energyfuels.com
9244 W. Hwy 141
Egnar, CO 81325

David Turk
Manager Environmental Health and Safety
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Unfortunately, it is not possible to predict precisely when the uranium commodity price will reach a level where it is profitable to reopen our mines. If a mine continues for 5 years without mining operations, Energy Fuels will notify the division pursuant to R647-4-117 and R647-3-113.

Please contact me at 303-389-4133 or <u>areither@energyfuels.com</u> if you have any questions or need additional information.

Sincerely,

Andrea Reither

**Environmental Permitting Specialist** 

Andrea Rother

cc: Mike Bradley, Wayne Western (UDOGM)

Tony Mansfield (SITLA)

F. Filas, J. Massey, R. Fisher (Energy Fuels)

Attachment: Rim Interim Management Plan